ability to compete with the ILEC.[239] Pre-ordering transactions often represent the end

customer's first contact with a competing carrier. Therefore, CLEC access to a BOC's pre-

ordering functionality must be on a level that allows the CLEC to provide service to

prospective customers in as efficient a manner as the BOC's retail operations. In both its Bell

Atlantic New York Order and SBC Texas Order, the FCC established the standard by which a

BOC's pre-ordering interfaces would be judged in determining whether the BOC provides

nondiscriminatory access to its pre-ordering functionality. The FCC concluded that the BOC

must offer CLECs an application-to-application interface that enables carriers to integrate

responses from pre-ordering transactions into the BOC's ordering interfaces. Further, the

BOC must make available to CLECs the same functionality that is available to the BOC's own

retail representatives. Through transaction response times and interface availability

performance measures, the BOC must be able to show that its pre-ordering OSS are capable of

sustaining both current and reasonably foreseeable future demands.[240] Finally, in its SBC

Texas Order, the FCC concluded that the BOC must also make available to CLECs

"nondiscriminatory access to OSS pre-ordering functions associated with determining whether

a loop is capable of supporting xDSL advanced technologies."[241]

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[239]   Bell Atlantic New York Order at ¶ 129; SBC Texas Order at ¶ 148.

[240]   Bell Atlantic New York Order at ¶ 128; SBC Texas Order at ¶ 147.

[241]   SBC Texas Order at ¶ 147 and n.394. The FCC noted in the SBC Texas Order that it
did not evaluate SWBT's compliance with the loop qualification obligations under Rule
(continued...)

The FCC has identified seven pre-ordering functions that it considers to be essential in providing competing carriers with nondiscriminatory access and a meaningful opportunity compete. The functions are: (1) retrieval of customer service records, (2) address validation, (3) telephone number selection and reservation, (4) service and feature availability, (5) due date availability, (6) loop qualification information inquiry, and (7) customer directory listing information.[242] The BOC must offer CLECs the ability to perform these functions in substantially the same time and manner as its own retail representatives.

ii. VZ-MA's Offering

VZ-MA has made available three interfaces for CLECs to use in conducting pre-ordering transactions. The web-based GUI is currently used by 79 CLECs in commercial production.[243] VZ-MA also offers two application-to-application interfaces. The EDI interface is currently used by 15 Massachusetts CLECs, and the Common Object Request Broker Architecture ("CORBA") interface is available to all CLECs, but is currently being utilized only by AT&T in commercial production.[244] The pre-ordering OSS back-end systems used by

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[241](...continued)
319 that went into effect in May 2000, but that future § 271 applicants will be expected to show compliance with these obligations.

[242] Bell Atlantic New York Order at ¶ 132.

[243] VZ-MA Application, Appdx. B, Vol. 46, Tab 533, at 4575 (Transcript of Technical Session Held 8/21/00).

[244] Id.; see also VZ-MA Application, Appdx. B, Vol. 32b, Tab 423, ¶ 33 (VZ-MA May
(continued...)

CLECs in Massachusetts are the same as those used in both New York and the remainder of

New England. Over the first six months of this year, VZ-MA notes that these systems

processed over 2.7 million transactions across the region.[245] VZ-MA also notes that its pre-

ordering systems can be integrated to automatically populate Local Service Requests ("LSRs"),

and that VZ-MA has assisted CLECs in integration by participating in collaborative sessions,

making address components consistent across the region, and synchronizing the field names for

pre-order and order data elements.[246]

VZ-MA provides CLECs with access to all of the same pre-order functions that are

available to CLECs in New York. The available pre-order functions include: (1) customer

service record ("CSR") retrieval; (2) address validation; (3) telephone number ("TN")

selection and reservation; (4) product and service availability; (5) due date availability; (6)

loop qualifications for ISDN and xDSL; (7) directory listing information request; (8)

installation status inquiry; and (9) service order inquiry.[247] VZ-MA measures and reports

response times for each of the available pre-order transactions using a simulated response

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[244](...continued)
OSS Aff.).

[245]   VZ-MA Application, Appdx. B, Vol. 42, Tab 494, ¶ 23 (VZ-MA August Supplemental
OSS Aff.).

[246]   VZ-MA Application, Appdx. B, Vol. 32b, Tab 423, ¶ 37 (VZ-MA May OSS Aff.).

[247]   VZ-MA Application, Appdx. B, Vol. 1, Tab 2, ¶ 19 (Miller Aff.).

system known as EnView.[248] The EnView system simulates the various pre-order transactions

for both retail and wholesale in six-minute increments, or ten times per hour.[249] VZ-MA

measures pre-order transactions against a standard of parity, plus not more than four seconds,

which is the same standard used by Verizon in New York, for both the EDI and CORBA

interfaces.[250] The lone exception to this standard is VZ-MA's standard for the parsed CSR

transaction, which takes the standard CSR response and divides the information into separate

fields for population into an LSR, and which has no direct retail equivalent. VZ-MA's parsed

CSR transaction is measured against a standard of parity to retail non-parsed CSR, plus not

more than ten seconds.

For the months of April through July 2000, VZ-MA met its performance standards for

each pre-order transaction over the EDI interface. For the CORBA interface, VZ-MA missed

its performance standards on only three occasions – product and service availability in May,

and rejected query response for both June and July. No standard has been developed for GUI

pre-order response times as GUI pre-order is not a part of the C2C Guidelines. However, VZ-

MA provided GUI pre-order response times for August 1999 through March 2000 as part of its

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[248]   VZ-MA Application, Appdx. B, Vol. 32a, Tab 423, ¶ 19 (VZ-MA May Measurements Aff.).

[249]   Id. at ¶ 25.

[250]   Id. at ¶ 20.

May 2000 filing with the Department.[251] Over this eight month period, VZ-MA's GUI

response time performance exceeded ten seconds only once. The response time for TN

selection in November 1999 was 15.65 seconds versus a retail response time of 1.68 seconds.

VZ-MA's OSS interfaces are scheduled to be available to CLECs on a 24 hour per day

basis. The C2C standard for VZ-MA's interface availability is 99.5 percent available during

scheduled prime-time hours. VZ-MA defines prime-time hours as being 6:00 am to midnight

Monday through Saturday, excluding holidays.[252] VZ-MA notes that if a back-end OSS system

is unavailable, then neither CLEC nor VZ-MA representatives will be able to access the

information on that system. Therefore, CLECs are adversely affected compared to retail

representatives only when the front-end OSS interface is unavailable. VZ-MA measures

interface availability through a combination of EnView-simulated transactions and CLEC-

reported outages. VZ-MA applies a weighting to CLEC-reported outages based on the number

of CLECs affected by the unavailability of a particular interface connection method.[253]

VZ-MA measures the availability of each of its three interfaces separately. Between

April and July 2000, VZ-MA's EDI interface has consistently been available more than 99

percent of the time during prime-time hours. Only in May 2000 did VZ-MA's EDI interface

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[251] See id. at Exh. C.

[252] VZ-MA Application, Appdx. B, Vol. 32b, Tab 423, ¶ 43 (VZ-MA May OSS Aff.).

[253] VZ-MA Application, Appdx. B, Vol. 46, Tab 538, at 4688-89 (Transcript of Technical Session Held 8/22/00).

prime-time availability fall below the C2C standard. However, during that month VZ-MA's

EDI interface was still available for 99.06 percent of scheduled prime-time hours. Over the

same period, VZ-MA's CORBA interface showed only slightly less performance for prime-

time availability. While the CORBA availability measure only surpassed the 99.5 percent C2C

standard in July, only once did the CORBA availability fall below 99 percent. In May 2000

CORBA scheduled prime-time availability was measured by VZ-MA to be 98.99 percent.

In its August 2000 Supplemental Filing with the Department, VZ-MA described a

series of problems that had caused CLECs to experience delays in accessing the GUI. VZ-MA

noted that, on July 25, 2000, a memorandum was sent to CLECs via the Change Management

process outlining three system infrastructure problems that VZ-MA had addressed to improve

the performance and availability of the GUI.[254] VZ-MA reported in its August Supplemental

Checklist Affidavit that CLEC trouble tickets regarding the GUI dropped from a level of 94

per week during the period of May 1 through June 22, prior to VZ-MA's fixes of the system

problems, to only 15 trouble tickets during the week of July 14 through July 20. Further, of

those 15 trouble tickets opened during the week of July 14, none related to system

unavailability.[255]

VZ-MA claims its performance metrics for the GUI availability is consistent with its

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[254]   See VZ-MA Application, Appdx. B, Vol. 42, Tab 494, ¶¶ 27-28 and Exh. E (VZ-MA August Supplemental OSS Aff.).

[255]   Id. at ¶ 28.

explanation of the problems experienced with the GUI during May and June. While GUI

scheduled prime-time availability for May (99.06 percent) and June (97.45 percent) missed the

C2C standard, VZ-MA's GUI availability performance for July was well above the 99.5

percent threshold, as VZ-MA reports 99.93 percent availability for the months of July.

Finally, VZ-MA also provides CLECs with information necessary to determine

whether a loop is qualified to provide advanced services, such as xDSL, to an end customer.

VZ-MA states that CLECs may obtain loop qualification information through any of three

methods. First, CLECs may use VZ-MA's pre-order interface to request loop information

from VZ-MA's mechanized loop qualification database. CLECs can also request manual loop

qualifications from VZ-MA to obtain information that is not available in the mechanized

database. Finally, VZ-MA offers CLECs the opportunity to request an engineering query for

specific loops in order to obtain detailed loop make-up information. VZ-MA's loop

qualification offerings are discussed in detail under checklist item 4.

iii. Competitors' Positions and VZ-MA's Response

During the Department's § 271 proceedings, various CLECs questioned VZ-MA's

ability to provide nondiscriminatory access to its OSS pre-ordering functions. These CLEC

questions deal primarily with VZ-MA's alleged inability to provide certain pre-order

functionality and with problems surrounding VZ-MA's interface availability.

Covad contends that VZ-MA's pre-order functions are not accessible to CLECs in the

same manner in which they are available to VZ-MA's own retail representatives. Covad

argues that address validation "is a clumsy and frustrating process because it requires exact

duplication of the address as it appears in BA's records."[256] Covad further contends that once

it is able to validate a customer's address, it must consult its own records to obtain the serving

central office information because VZ-MA's pre-order responses do not include such

information.[257] Covad also argues that, unlike CLECs, VZ-MA retail representatives are able

to obtain customers' CSR information using only their telephone numbers. Covad contends

that this does not represent parity of service.[258]

VZ-MA refutes Covad's claims about pre-order functionality and notes that the CLEC

Handbook and Pre-Order Business Rules explain in detail how Covad and other CLECs can

obtain the information Covad states it must obtain from its own internal records. VZ-MA

notes that serving central office information and the switch common language location

identification ("CLLI") code are available as part of the response to address validation

transactions and that the procedures for obtaining that information are explained in the Pre-

Order Business Rules. VZ-MA also points out that the details relating to the proper entry of

addresses in the address validation transaction are included in the Pre-Order Business Rules.

VZ-MA retail representatives follow the same Business Rules for these pre-order functions as

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[256]   VZ-MA Application, Appdx. B, Vol. 38, Tab 462, ¶ 28 (Covad Szafraniec/Katzman).
        Decl.).

[257]   Id. at ¶¶ 29-30.

[258]   Id. at ¶ 19.

CLECs are required to follow.[259] Finally, VZ-MA responds to Covad's assertions regarding

the alleged disparity in access to CSR information by stating that Covad, and all other CLECs,

have immediate access to any customer or prospective customer's CSR information through

any of the three OSS interfaces available to CLECs.[260]

In the area of interface availability, a number of the CLEC's complaints are addressed

by the GUI system infrastructure changes implemented by VZ-MA in May and June 2000.[261]

However, both AT&T and WorldCom contend that there are still problems with VZ-MA's

interface availability, and both CLECs argue that VZ-MA's reported performance is

inaccurate. AT&T contends that the CORBA interface is frequently unavailable, and that

AT&T consistently experiences time-outs while performing pre-order functions. AT&T states

that VZ-MA has not provided any root-cause analysis of the problems with the CORBA

interface, and that VZ-MA's method for resolving many of these errors is to re-boot its servers

to resume service. AT&T provided to the Department a listing of pre-order interface errors it

has experienced since November 1999, including 63 performance problems experienced since

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[259] VZ-MA Application, Appdx. B, Vol. 42, Tab 494, ¶ 21 (VZ-MA August Supplemental OSS Aff.).

[260] Id. at ¶ 22.

[261] See VZ-MA Application, Appdx. B, Vol. 46, Tab 538, at 4800 (Transcript of Technical Session Held 8/22/00).

April 1, 2000.[262] Of the problems experienced since April 1, AT&T highlights a three-day outage from April 17 to 19 that AT&T contends casts doubt on VZ-MA's reported interface availability for April 2000.[263]

WorldCom contends that Verizon's GUI performance has been consistently flawed, even after the system fixes were put in place in May and June. During technical sessions, WorldCom witnesses noted that WorldCom had experienced GUI outages on June 29 and 30, and July 1, 8, 15, 20, 21, 22, and 23. WorldCom noted that it opened trouble tickets with Verizon on July 8, 15, and 20.[264] WorldCom further argues that during times when the GUI has been available, the interface has worked very slowly and has made it difficult for WorldCom to submit transactions via that interface.[265]

VZ-MA asserts that AT&T's complaints regarding the availability of the CORBA interface are misleading. During a technical session held on August 22, VZ-MA witness McLean explained that because CORBA is a synchronous interface, a transaction must make a complete cycle from the CLEC to VZ-MA and back to the CLEC in order for the system to

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[262]   See VZ-MA Application, Appdx. B, Vol. 44, Tab 506 (AT&T's Response to DTE-ATT-1-5).

[263]   Id.; see also VZ-MA Application, Appdx. B, Vol. 46, Tab 538, at 4822-23 (Transcript of Technical Session Held 8/22/00).

[264]   VZ-MA Application, Appdx. B, Vol. 46, Tab 538, at 4854-55 (Transcript of Technical Session Held 8/22/00).

[265]   VZ-MA Application, Appdx. B, Vol. 37, Tab 455, ¶ 100 (WorldCom Lichtenberg/Sivori Decl.).

record that the interface is properly functioning.[266] McLean explained that when there are

problems with the CORBA interface, both VZ-MA and the CLEC must work together to

diagnose the source of the problem. McLean noted that AT&T failed to mention that this type

of cooperative effort is currently occurring on between VZ-MA and AT&T regarding instances

of interface timeouts when AT&T submits an address validation transaction immediately

followed by a parsed CSR request.[267]

In response to the contentions of both AT&T and WorldCom, VZ-MA provided a

summary of all CLEC-reported pre-order interface troubles from April through July.[268] VZ-

MA reports that during this period, CLECs reported 84 distinct troubles (some troubles were

repeated in multiple trouble tickets). Of these 84 instances, 52 actually indicated interface

outages that would be reflected in VZ-MA's performance measures. Nineteen instances

related to the unavailability of specific transactions or back-end OSS systems. VZ-MA notes

that these instances were experienced equally by VZ-MA's retail representatives. Of the

remaining 13 reported troubles, five were instances of slow response, three were related to

CLECs' connectivity problems, three were unrelated to pre-order, and in two cases VZ-MA

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[266]   VZ-MA Application, Appdx. B, Vol. 46, Tab 538, at 4691-92 (Transcript of Technical
Session Held 8/22/00).

[267]   Id. at 4693-94.

[268]   See VZ-MA Application, Appdx. B, Vol. 47, Tab 560 (VZ–MA's Response to RR-
DTE-330).

found no problems during its investigation of the reported trouble.[269] VZ-MA also provides

information specifically related to WorldCom's assertion that there have been numerous

planned and unplanned interface outages since VZ-MA implemented its GUI infrastructure

changes in May and June.[270] VZ-MA reports that none of WorldCom's reported outages were

instances of interface unavailability. In every case reported by WorldCom, VZ-MA explains

that the outages were related only to specific back-end OSS systems that similarly affected

retail and wholesale transactions. Further, only one of WorldCom's reported outages – the

July 8 unavailability of address validation, TN reservation, and xDSL loop qualification from

10:00 p.m. to midnight – affected CLECs operating in Massachusetts. Unlike WorldCom's

claim, though, VZ-MA notes that this was a planned unavailability and references Change

Request (CR) #1547 as evidence that CLECs were notified of this instance in advance of the

planned unavailability.[271]

iv.   KPMG's Findings

In its evaluation of VZ-MA's OSS, KPMG combined the Pre-Order, Order, and

Provisioning areas of VZ-MA's wholesale systems and processes into a single domain. The

combination of these three aspects of VZ-MA's wholesale offerings enabled KPMG to conduct

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[269]   Id.

[270]   See VZ-MA Application, Appdx. B, Vol. 47, Tab 557 (VZ–MA's Response to RR-DTE-341).

[271]   Id.

its test in a manner that better resembles the experiences an actual CLEC would have

competing in the Massachusetts local market. Throughout the Pre-Order, Order, and

Provisioning ("POP") domain, KPMG evaluated 204 individual test points. While KPMG's

evaluation was integrated in most respects, this aspect of KPMG's test examined the areas of

Pre-Order, Order, and Provisioning separately wherever possible. Within the POP domain,

KPMG evaluated VZ-MA's pre-order capabilities through the EDI and GUI functional

evaluations, the EDI and GUI volume performance evaluations, the VZ-MA documentation

review, and the review of VZ-MA's capacity management planning. KPMG also reviewed

VZ-MA's pre-order performance metrics reporting processes as part of its Performance

Metrics review.

KPMG evaluated VZ-MA's pre-order transaction functionality through the submission

of test transactions over both the EDI and GUI interfaces. KPMG's EDI and GUI functional

evaluations examined the availability of the pre-order interfaces and VZ-MA's capability to

provide timely and accurate responses to a variety of pre-order transactions. The functional

evaluations also included the submission of pre-order transactions with planned errors to

ensure VZ-MA's systems are capable of providing accurate error responses that contain the

necessary information for a CLEC representative to correct and resubmit the transaction.[272]

While KPMG's functional evaluations focused predominantly on VZ-MA's LSOG-2 interface,

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[272]   VZ-MA Application, Appdx. I, Vol. 1, Tab 1, at 15, 71 (KPMG Final Report Version
          1.4).

KPMG also submitted transactions over the LSOG-4 interface to ensure that the LSOG-4

interface also provides CLECs with sufficient functionality.

In its evaluation of VZ-MA's pre-order functionality, KPMG states that it found VZ-

MA's pre-ordering interfaces to be available on a consistent and reliable basis. Through a

review of VZ-MA's Change Control notices and its own usage experiences, KPMG reports

that VZ-MA's EDI pre-ordering interface was available 100 percent of the scheduled prime-

time hours for the duration of KPMG's testing.[273] KPMG also reports that VZ-MA's GUI was

available 99.85 percent of scheduled prime-time hours during KPMG's test period.[274]

KPMG reports that, during the conduct of its functional evaluations, VZ-MA's pre-

order systems returned responses for 94 percent of KPMG's EDI pre-order transactions.[275]

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[273]   Id. at 47.

[274]   Id. at 100.

[275]   Id. at 48. KPMG characterized the problems it experienced in receiving responses for
CSR inquiries and Installation Service Requests (ISRs) over the EDI interface in
Exception Report #13. KPMG noted in its Exception that these problems, if not
corrected, could impede CLECs' ability to conduct business over the EDI interface.
See VZ-MA Application, Appdx. I, Vol. 2, Tab 2 (Exception Report #13). VZ-MA
responded to KPMG's Exception by explaining that some of KPMG's CSR errors were
the result of KPMG's use of a resale account ID to perform transactions that do not
apply to resale services. VZ-MA stated that a database error had caused the remainder
of the CSR errors. See VZ-MA Application, Appdx. I, Vol. 2, Tab 2 (VZ-MA
Response to Exception #13). VZ-MA fixed the error and KPMG was able to
successfully retest its CSR inquiries. See VZ-MA Application, Appdx. I, Vol. 2, Tab
2 (Disposition Report for Exception #13). With respect to the ISR problems noted by
KPMG, VZ-MA implemented a system fix to the EDI software on July 28, 2000 and
KPMG successfully retested these inquiries. See id.

KPMG notes, however, that VZ-MA implemented system improvements to various pre-order

systems during the functional evaluations, and that KPMG received responses on 98 percent of

its pre-order transactions.[276] KPMG notes that the average response times for its due date

availability, address validation, and parsed and unparsed CSR pre-order transactions met the

parity plus four second C2C standard.[277] KPMG reports that the response times for its product

service availability transactions did not meet the C2C standard; however, 95 percent of

KPMG's product service availability transactions were received within ten seconds.[278]

As to the accuracy of VZ-MA's pre-order responses, KPMG states that the information

included on responses were correct for all pre-order transaction types with the exception of one

field in the address validation transaction. KPMG explains that "SUIT" (an abbreviation for

"suite") or "UNIT" was returned in place of "APT" for 64 percent of the address validation

transactions examined.[279] Finally, KPMG reports that its functional evaluation of VZ-MA's

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[276] VZ-MA Application, Appdx. I, Vol. 1, Tab 1, at 48 (KPMG Final Report Version 1.4).

[277] Id. at 49.

[278] Id.

[279] Id. at 57. VZ-MA states that the errors KPMG reported with respect to the return of "SUIT" or "UNIT" designations where "APT" was expected are the result of the manner in which KPMG's test bed of accounts was created. VZ-MA explains that KPMG's test accounts were manually entered into both the address database and the VZ-MA billing systems by two separate groups of VZ-MA employees. VZ-MA states that the two groups entered the addresses with different designations, creating the opportunity for KPMG to receive unexpected address validation responses. VZ-MA
(continued...)

LSOG-4 EDI pre-order interface revealed equally strong performance.[280]

With respect to the LSOG-2 GUI, KPMG reports that it received responses on 100 percent of its pre-order transactions.[281] With respect to the accuracy of VZ-MA's GUI pre-order responses, KPMG states that its responses were complete and accurate in most cases, but that it did experience problems with the "INQNUM" field missing from responses.[282] In its LSOG-4 GUI functional evaluation, KPMG reports that VZ-MA provides responses for all of the pre-order transactions. KPMG notes that it experienced the same problems in LSOG-4 with the missing "INQNUM" field, but states that "INQNUM" data was returned in the "PON" field in KPMG's LSOG-4 GUI pre-order responses.[283]

KPMG also tested VZ-MA's EDI and GUI pre-order interfaces as part of its Volume Performance Test. KPMG's Volume Performance Test evaluated VZ-MA's ability to handle

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[279](...continued)
notes that this error can not occur in a commercial environment because "address data is updated via a mechanized feed into Livewire and service representatives utilize that information in preparing service orders for new accounts." See VZ-MA Application, Appdx. B, Vol. 47, Tab 560 (VZ–MA's Response to RR-DTE-354).

[280]   VZ-MA Application, Appdx. I, Vol. 1, Tab 1, at 61-64 (KPMG Final Report Version 1.4).

[281]   Id. at 101.

[282]   Id. at 104. "INQNUM" stands for Inquiry Number. This field is used to identify a tracking number, similar to a Purchase Order Number ("PON"), that links the CLEC's pre-order inquiry with VZ-MA's pre-order response.

[283]   Id. at 107.

CLEC transactions at projected daily, peak, and stress volumes for October 2000.[284] KPMG

conducted the Volume Performance Test at the same time that it was submitting individual

transactions for the functional evaluations of VZ-MA's interfaces. Though the results are

reported separately, KPMG examined both the EDI and GUI interfaces simultaneously in its

Volume Performance Test.[285]

During the Volume Performance Test, KPMG received responses for 99.9 percent of

the transactions submitted via the EDI interface and 99.8 percent of transactions submitted

over the GUI.[286] KPMG also reports that VZ-MA returned timely pre-order responses for both

interfaces under volume conditions. While VZ-MA's transaction responses met C2C standards

for only some transactions, KPMG experienced an average response time of greater than ten

seconds for only its EDI and GUI mechanized xDSL Loop Qualification ("LXR")

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[284] Id. at 15, 71.

[285] In a Letter Order issued May 12, 2000, the Department denied a motion submitted by AT&T to conduct volume testing of VZ-MA's LSOG-4 production environment. The Department stated in the Letter Order that since the LSOG-2/3 production environment continues to be the predominant environment for CLECs submitting commercial transactions in Massachusetts, KPMG's volume testing should be focused on VZ-MA's ability to handle foreseeable volumes in that environment. The Department further noted that it had directed KPMG to conduct functionality testing of VZ-MA's LSOG-4 environment to ensure that CLEC transactions submitted to VZ-MA via LSOG-4 are capable of being processed correctly by VZ-MA's systems, and, hence, the Department found "a volume test of the LSOG-4 [production environment] release to be unwarranted." See VZ-MA Application, Appdx. B, Vol. 30, Tab 409, at 2 (Letter Order on AT&T's Motion to Adjust the Master Test Plan and to Clarify the Procedural Schedule).

[286] Id. at 48, 101.

transactions.[287]

KPMG's POP Documentation Review evaluated the published documents that VZ-MA

makes available to CLECs to assist them in using VZ-MA's pre-order interfaces. KPMG

evaluated VZ-MA's documentation on the basis of whether it provides clear, accurate, and

complete information to allow a CLEC representative to submit successfully pre-order

transactions and to correct errors in pre-order transactions.[288] As part of its review, KPMG

conducted interviews with both the VZ-MA staff responsible for developing pre-order

documentation and the CLECs that use VZ-MA documentation in performing their pre-order

transactions.[289] In its report, KPMG states that it finds VZ-MA's pre-order documentation

satisfactory to meet the needs of CLECs conducting business through VZ-MA's pre-ordering

interfaces.[290] KPMG notes that inconsistencies between separate sets of documentation

discovered during the course of its test were corrected to achieve consistency between

publications.[291]

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[287]   Id. at 55, 102-103.

[288]   Id. at 131-133.

[289]   Id. at 141.

[290]   Id. at 141-150.

[291]   Id. at 144. KPMG issued Exception Reports #4, #10, and #12 during its evaluation,
         identifying a number of inconsistencies in VZ-MA's pre-order documentation and areas
         where VZ-MA's was not considered to contain sufficient detail to enable CLECs to
         submit complete and accurate pre-order inquiries. See VZ-MA Application, Appdx. I,
                                                                                  (continued...)

KPMG conducted a capacity management review of VZ-MA's pre-ordering systems to assess whether VZ-MA has in place adequate procedures and tools to manage the projected growth in CLEC demand. In conducting this evaluation, KPMG reviewed relevant VZ-MA documentation and conducted interviews with VZ-MA personnel.[292] KPMG concludes in its report that VZ-MA's capacity management process is adequate to meet both current and projected future volumes of CLEC transactions.[293]

As part of its Performance Metric Review, KPMG evaluated VZ-MA's methods for recording, calculating and reporting its performance metrics related to pre-ordering functions.[294] KPMG examined the EnView system used by VZ-MA to verify interface

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[291](...continued)
Vol. 2, Tab 2 (Exception Report #4); see also VZ-MA Application, Appdx. I, Vol. 2, Tab 2 (Exception Report #10); see also VZ-MA Application, Appdx. I, Vol. 2, Tab 2 (Exception Report #12). In its Disposition Reports for these three Exceptions, KPMG states that, for each identified and confirmed error, VZ-MA implemented the necessary changes to improve the quality and accuracy of its pre-order documentation. See VZ-MA Application, Appdx. I, Vol. 2, Tab 2 (Disposition Report for Exception #4); see also VZ-MA Application, Appdx. I, Vol. 2, Tab 2 (Disposition Report for Exception #10); see also VZ-MA Application, Appdx. I, Vol. 2, Tab 2 (Disposition Report for Exception #12).

[292] VZ-MA Application, Appdx. I, Vol. 1, Tab 1, at 235 (KPMG Final Report Version 1.4).

[293] Id. at 235-238.

[294] KPMG's Performance Metrics Review also included a data integrity investigation and a transaction test report generation component. These components were not performed with respect to pre-ordering metrics because the EnView system data used to calculate pre-ordering metrics are simulated and do not represent real transactions. See VZ-MA
(continued...)

availability and to simulate retail and wholesale pre-order transaction response times. KPMG

reports that it was able to replicate most of VZ-MA's reported pre-ordering response time

metrics for December 1999 and January and February 2000, but experienced problems with

the replication of interface availability metrics.[295] KPMG attributed these problems to VZ-

MA's lack of formal change management procedures for pre-order metrics calculation, and

notes that VZ-MA did not track changes to the metrics calculation algorithms in the "Global

Change Tracking Register."[296]

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[294](...continued)
Application, Appdx. I, Vol. 1, Tab 1, at 650, 685 (KPMG Final Report Version 1.4).

[295]   Id. at 660-661.

[296]   Id. at 664-668. KPMG characterized the problems with VZ-MA's pre-ordering and
provisioning metrics change control processes in Exception Report #14. KPMG
explained that VZ-MA had changed numerous algorithm scripts between December
1999 and February 2000 without providing any documentation that such changes had
been made. KPMG concluded that these undocumented changes hindered KPMG's
ability to replicate VZ-MA's reported pre-ordering and provisioning metrics. See VZ-
MA Application, Appdx. I, Vol. 2, Tab 2 (Exception Report #14). In response to
KPMG's findings, VZ-MA notes that it has recently implemented a metrics change
control process. See VZ-MA Application, Appdx. I, Vol. 2, Tab 2 (VZ-MA Response
to Exception #14). However, while KPMG stated that VZ-MA's change control
process appeared to satisfy all of KPMG's reported problems, VZ-MA's
implementation of this process could not be reviewed by KPMG prior to the conclusion
of its OSS evaluation. Therefore, on October 8 and 9, 2000, the Department undertook
to review and assess VZ-MA's compliance with its defined metrics change control
process. See VZ-MA Application, Appdx. B, Vol. 46, Tab 545, at 4877-4878
(Transcript of Technical Session Held 8/28/00).

In conducting its review of VZ-MA's metrics change control process, the
Department followed the same process used by KPMG in its OSS evaluation. First, the
(continued...)

v.   Conclusions

Based upon the evidence in the record, and the independent testing of KPMG, the

Department finds that VZ-MA provides competitors with nondiscriminatory access to its pre-

ordering OSS functions. Specifically, the Department finds that VZ-MA's EDI and GUI

interfaces offer CLECs access to pre-ordering functions in substantially the same time and

manner as VZ-MA makes such functions available to its own retail representatives. The

Department also finds that VZ-MA has implemented the necessary processes to satisfy the

metrics change control issues raised by KPMG in its third-party evaluation. Further, the

Department can not accord significant weight to the CLECs' arguments, which are not

supported by either KPMG's evaluation or VZ-MA's current performance metrics, to warrant

a finding of noncompliance with the pre-ordering aspects of VZ-MA's requirement to provide

nondiscriminatory access to its OSS.

f.   Ordering

i.   Standard of Review

In meeting its obligation to provide nondiscriminatory access to its ordering systems,

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[296](...continued)
> Department compared the reported results of August 2000 performance measures
> calculated under both the August and July algorithms. The Department then examined
> any discrepancies between the two sets of results and checked the differences against
> VZ-MA Change Control Notices. The Department found that in every case, VZ-MA
> had provided advance notice of metrics calculation changes through a formal Change
> Control Notice. The Department concludes that VZ-MA's defined metrics change
> control process sufficiently records changes to the metrics calculation process and
> allows for effective tracking of such changes.

the FCC has found that a BOC must show that:

> (i) it is able to return timely order confirmation and rejection notices; (ii) its systems flow-through a high percentage of orders without manual handling, at a rate that is comparable overall to the flow-through rate for its retail services; (iii) the mechanized orders that do not flow-through are handled in a reasonably prompt and accurate manner; (iv) the mechanized and manual components of its ordering systems are scalable to accommodate increasing demand; (v) it provides jeopardy notices in a nondiscriminatory manner; and (vi) it provides timely order confirmation notices.[297]

For those ordering functions that have a retail analogue, the FCC has determined that the BOC must provide service to CLECs in "substantially the same time and manner as it provides to its retail operations," and for those with no retail analogue, the BOC must show that it allows "an efficient competitor a meaningful opportunity to compete."[298]

In its Bell Atlantic New York Order, the FCC explained that flow-through rates are not a definitive indicator of the BOC's ability to provide nondiscriminatory access to its ordering systems, but rather are "a tool used to indicate a wide range of possible deficiencies in a BOC's OSS that may deny an efficient competitor a meaningful opportunity to compete in the local market."[299] In the absence of high flow-through rates, the FCC has noted that it will examine more closely the other factors involved in its review of the BOC's ordering

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[297]   SBC Texas Order at ¶170.

[298]   Id.

[299]   Bell Atlantic New York Order at ¶ 162.

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functionality.[300]

ii.   VZ-MA's Offering

VZ-MA provides CLECs with the ability to submit LSRs electronically over both the

web-based GUI and the EDI application-to-application interface. Currently, 15 Massachusetts

CLECs are using the EDI interface to submit commercial transactions in Massachusetts.[301]

VZ-MA notes that it processed over 48,000 LSRs in Massachusetts in July 2000, a 92 percent

increase over the same period in 1999,[302] and the same systems and work centers that process

Massachusetts orders are responsible for processing nearly 500,000 orders per month

throughout New England and New York.[303] VZ-MA also notes that it is processing orders for

CLECs in each of the delivery methods available. Of the 48,000 LSRs processed in July, VZ-

MA states that approximately 25,500 were for UNE loops, 5,000 were for UNE-P

combinations, and 17,500 were resale orders.[304] While CLECs are able to use the LSOG-4

industry guidelines for their ordering systems in Massachusetts, most CLECs continue to

utilize the LSOG-2 industry guidelines. In July, 99.5 percent of the LSRs submitted over the

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[300]   Id. at ¶ 163.

[301]   VZ-MA Application, Appdx. B, Vol. 46, Tab 533, at 4575 (Transcript of Technical
Session Held 8/21/00).

[302]   Id.

[303]   VZ-MA Application, Appdx. B, Vol. 46, Tab 538, at 4864 (Transcript of Technical
Session Held 8/22/00).

[304]   Id. at 4734-35.

EDI interface were submitted under the LSOG-2 guidelines.[305]

VZ-MA processes CLEC orders received via the GUI and EDI interfaces and returns either a confirmation or reject notice over the same interface the CLEC used to submit the order. VZ-MA tracks a number of C2C Guidelines with respect to its obligation to return timely order confirmation and reject notices. For orders that flow-through VZ-MA's ordering systems without manual handling, VZ-MA is obligated to return 95 percent of confirmation and reject notices within two hours of the receipt of the LSR. For orders that require manual processing, VZ-MA follows two standards based upon the number of lines involved on the LSR. VZ-MA must return 95 percent of confirmations and rejects within 24 hours on LSRs with less than 10 lines, and within 72 hours for LSRs with 10 or more lines.[306] As part of its C2C requirements, VZ-MA provides performance measurements for confirmation and reject notice timeliness separately for both resale and UNEs, and within each of those product types VZ-MA distinguishes between specific types of orders.[307]

VZ-MA's performance for confirmation and reject notice timeliness has been generally strong over the period of April through July 2000. Over the four-month period, VZ-MA

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[305]   VZ-MA Application, Appdx. B, Vol. 47, Tab 550 (VZ-MA's Response to RR-DTE-331).

[306]   VZ-MA Application, Appdx. B, Vol. 32b, Tab 423, ¶ 68 (VZ-MA May OSS Aff.); see also VZ-MA Application, Appdx. B, Vol. 32a, Tab 423, ¶¶ 35-36 (VZ-MA May Measurements Aff.).

[307]   VZ-MA Application, Appdx. B, Vol. 32a, Tab 423, ¶¶ 36-37 (VZ-MA May Measurements Aff.).

missed its C2C standard for only four different areas. First, VZ-MA's performance for resale

Complex Local Service Request Confirmations ("LSRCs")[308] was 81.81 percent in April and

93.33 percent in May, but exceeded the standards in both June and July. VZ-MA's UNE-

Loop reject timeliness for orders with fewer than ten lines was below the C2C standard in

April (92.49 percent), May (91.58 percent), and June (91.41 percent), but met the standard for

July. Third, in June, VZ-MA fell below the C2C standard in its performance on the return of

LSRCs for resale plain-old-telephone service ("POTS") orders with ten or more lines.

However, VZ-MA's performance during June for this measure was 93.15 percent, and VZ-

MA met the standard of 95 percent in each of the other three months. Finally, VZ-MA missed

its C2C standard for only one confirmation or reject notice metric in July, with a UNE-P flow-

through reject rate of 94.90 percent.

Throughout the Department's proceedings much emphasis has been placed on VZ-

MA's flow-through performance for CLEC orders. VZ-MA notes that high levels of order

flow-through are desirable for both VZ-MA and the CLECs.[309] However, the rate of order

flow-through is also dependent on the efforts of both VZ-MA and the CLECs and on the order

types. VZ-MA has worked diligently to improve the areas of order flow-through that it can

control directly, and the Company has also worked with the CLECs to enable them to improve

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[308]   The term LSRC can be used interchangeably with Firm Order Confirmation ("FOC").

[309]   VZ-MA Application, Appdx. B, Vol. 46, Tab 538, at 4863 (Transcript of Technical
Session Held 8/22/00).

the quality of their orders so that more eligible orders do flow-through VZ-MA's systems.

VZ-MA's ordering OSS systems automatically perform a series of checks and edits on CLEC LSR submissions to determine first whether or not the order is of a type that is designed to flow-through. If the order is flow-through eligible, VZ-MA's systems check the LSR to ensure that all necessary information is present on the LSR and is in the correct format. As of June 17, 2000, VZ-MA's systems were able to flow-through more than seventy different ordering scenarios across the three services of resale, UNE-P, and UNE-Loops.[310] Since November 1999, VZ-MA has implemented 51 system improvements to its flow-through order process.[311] Among the improvements that VZ-MA has made, CLEC orders for UNE-P arrangements with additional lines, Ringmate service, and UNE-Loop migrations with hunting features are now eligible to flow-through VZ-MA's OSS.[312] Additionally, VZ-MA changed the telephone number field requirements for resale orders, causing a drop in order fall-out from 1,214 in December to only 33 in January 2000.[313] Finally, on June 17, 2000, VZ-MA implemented further system enhancements to its order flow-through allowing pre-qualified

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[310] See VZ-MA Application, Appdx. B, Vol. 34b, Tab 443 (VZ–MA's Response to DTE-WorldCom-4-12).

[311] VZ-MA Application, Appdx. B, Vol. 46, Tab 533, at 4578-79 (Transcript of Technical Session Held 8/21/00).

[312] VZ-MA Application, Appdx. B, Vol. 32b, Tab 423, ¶¶ 61-62 (VZ-MA May OSS Aff.).

[313] Id. at ¶ 63.

ADSL orders of less than 10 lines to flow-through its OSS.[314]

In addition to making improvements to its own systems to improve flow-through performance, VZ-MA has also assisted CLECs in improving their orders to achieve greater flow-through results. VZ-MA provides flow-through documentation to CLECs over its wholesale web site and through its Change Management process. Further, in November 1999 VZ-MA began holding monthly CLEC flow-through workshops. The purpose of these workshops is to review the problems that CLECs have experienced in attaining high levels of order flow-through and to discuss with the CLECs the methods by which they can improve their flow-through performance. VZ-MA notes that while these flow-through workshops have been built around the flow-through problems experienced in New York, any improvements to order flow-through are experienced equally in Massachusetts. Finally, VZ-MA notes that it has developed a "complete inventory of flow-through errors by individual CLEC and by mode-of-entry" to enable CLECs to eliminate repeat errors of similar types.[315]

Under the C2C Guidelines, VZ-MA has a performance standard in place to provide an "achieved flow-through" rate of 95 percent. Achieved flow-through is defined in the C2C Guidelines as the percentage of those order types that are designed to flow-through VZ-MA's

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[314] VZ-MA Application, Appdx. B, Vol. 34a, Tab 443 (VZ–MA's Response to DTE-5-35).

[315] VZ-MA Application, Appdx. B, Vol. 32b, Tab 423, ¶¶ 65-67 (VZ-MA May OSS Aff.).

OSS that actually do flow-through.[316] VZ-MA has not yet begun reporting its measurements for "achieved flow-through," but has reported total flow-through rates, which includes order types that are not designed to flow-through, for Massachusetts. For resale services in Massachusetts during the period of April through July 2000, VZ-MA reports total flow-through rates of 51.19 percent, 44.60 percent, 43.80 percent, and 42.41 percent. Additionally, during technical sessions held by the Department, VZ-MA testified that resale flow-through for the first 18 days of August was 53 percent.[317] Total flow-through rates for UNE services over the same four-month period were 38.41 percent, 30.35 percent, 38.47 percent, and 39.51 percent. During the first 18 days of August, VZ-MA testified that UNE flow-through rates were at 37 percent.[318]

While the overall flow-through rates for CLECs in Massachusetts appear to be low, VZ-MA argues, and the Department agrees, the causes for such performance do not rest exclusively with VZ-MA. After reviewing flow-through performance disaggregated by CLEC, it became apparent that the abilities of individual CLECs to create complete and accurate LSRs has a significant impact on the rate of order flow-through. Among Massachusetts resellers, VZ-MA provided information showing that over the period of January through June 2000

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[316] See VZ-MA Application, Appdx. B, Vol. 32a, Tab 423, ¶ 46 (VZ-MA May Measurements Aff.).

[317] VZ-MA Application, Appdx. B, Vol. 46, Tab 533, at 4578-79 (Transcript of Technical Session Held 8/21/00).

[318] Id.

individual resellers attained flow-through rates ranging from less than 5 percent to over 80

percent.[319] For CLECs ordering UNEs in Massachusetts, VZ-MA presented similar

information showing that over the period of January through June 2000 individual CLECs

achieved flow-through rates ranging from zero to more than 93 percent.[320] These

disaggregated figures show that while VZ-MA's overall flow-through performance appears

low, VZ-MA's systems are quite capable of allowing CLECs and resellers to attain high levels

of order flow-through and of sustaining future commercial volumes. In addition, these figures

represent total flow-through, and, as noted above, a number of order types are not currently

designed to flow-through and the order types that are designed to flow-through (e.g., UNE-P)

represent a smaller percentage of the total orders in Massachusetts than they do in New York.

There are a number of factors that must be taken into account when examining

VZ-MA's order flow-through performance. First, the CLEC's ability to provide a complete

and accurate LSR, as discussed above, is an essential first step in determining whether or not

an order will flow-through VZ-MA's OSS. The mix of orders CLECs submit has an equally

large effect on flow-through rates. VZ-MA notes, for example, that order supplements and

cancellations do not flow-through the company's OSS ordering systems.[321] VZ-MA explains

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[319]   VZ-MA Application, Appdx. B, Vol. 47, Tab 553 (VZ-MA's Response to RR-DTE-342).

[320]   Id.

[321]   VZ-MA Application, Appdx. B, Vol. 42, Tab 494, ¶ 12 (VZ-MA August Supplemental
(continued...)

that these types of transactions are not designed to flow through so that VZ-MA's TIS OC

personnel can ensure that the original pending service order is not executed while the

supplement or cancellation is being processed by the company's OSS.[322] VZ-MA states that

nearly 40 percent of CLEC UNE-Loop orders, 17 percent of UNE-P orders, and 25 percent of

resale orders fall into the category of supplements and cancellations.[323] While VZ-MA has

begun implementing system enhancement that will allow some of these supplements and

cancellations to be processed on a flow-through basis, the volume of CLEC order supplements

and cancellations has a significant effect on the overall flow-through rates. For example, VZ-

MA notes that if order supplements and cancellations were excluded from the UNE-Loop flow-

through calculation, VZ-MA's flow-through performance would increase by 67 percent.[324]

During technical sessions held by the Department, VZ-MA testified that if order supplements

and cancellations were excluded from the flow-through calculations, VZ-MA's flow-through

performance for the first 18 days of August would increase from 53 percent to 69 percent for

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[321](...continued)
Measurements Aff.).

[322]   Id.

[323]   VZ-MA Application, Appdx. B, Vol. 42, Tab 494, ¶ 38 (VZ-MA August Supplemental OSS Aff.).

[324]   VZ-MA Application, Appdx. B, Vol. 42, Tab 494, ¶ 12 (VZ-MA August Supplemental Measurements Aff.).

resale and from 37 percent to 62 percent for UNEs.[325]

In showing that it is providing nondiscriminatory access to its OSS ordering systems, VZ-MA must show that it is adequately processing not only those orders that flow-through its systems, but also that it has systems and measures in place to process efficiently those orders that do not flow-through. In order to meet these requirements, VZ-MA has four separate TIS OC work centers to perform the manual editing and processing of CLECs' non-flow-through orders, the Boston Resale Center to process resale orders, the Boston Platform Center to handle UNE-P orders, the DSL Center to address CLECs' xDSL and advanced services needs, and the UNE-Loop/Hot-Cut Center, which processes orders for non-complex UNEs.[326] VZ-MA currently has 717 wholesale service representatives staffing the four TIS OC work centers, a 126 percent increase between November 1999 and July 2000.[327] With specific regard to VZ-MA's resources for advanced services order processing, the DSL Center has a staff of 122 representatives specifically trained to handle xDSL and premium loop orders.[328] VZ-MA developed its TIS OC staffing plans on the basis of a model developed by Andersen Consulting. VZ-MA notes that Andersen Consulting's analysis of VZ-MA's work center

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[325] VZ-MA Application, Appdx. B, Vol. 46, Tab 533, at 4578-79 (Transcript of Technical Session Held 8/21/00).

[326] VZ-MA Application, Appdx. B, Vol. 32b, Tab 423, ¶ 69 (VZ-MA May OSS Aff.).

[327] VZ-MA Application, Appdx. B, Vol. 42, Tab 494, ¶ 50 (VZ-MA August Supplemental OSS Aff.).

[328] Id. at ¶53.

staffing incorporated a review of both current and projected future manual processing demands.[329] As evidence that its TIS OC staffing levels are adequate to meet its manual order processing requirements, VZ-MA notes that its on-time performance in providing manual confirmation and reject notices exceeded C2C standards in June 2000.[330]

Apart from measuring the speed at which its TIS OC personnel perform their manual order processing duties, VZ-MA also measures the accuracy of the TIS OC's work through three service order accuracy metrics -- orders, opportunities, and LSRCs.[331] VZ-MA notes that the methods by which these measurements are calculated are flawed in certain respects, but contends that they understate, rather than overstate, the TIS OC's performance in manually processing CLEC orders. For example, the service order accuracy metrics count as errors any difference between the original valid LSR and the service order that is entered into VZ-MA's systems. These differences include not only errors created by TIS OC personnel, but also instances whereby TIS OC personnel corrected errors that the CLEC made on the original LSR.[332] VZ-MA also states that it has uncovered some instances of incorrect practices in the

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[329] VZ-MA Application, Appdx. B, Vol. 34a, Tab 443 (VZ–MA's Response to DTE-ATT-4-13).

[330] VZ-MA Application, Appdx. B, Vol. 42, Tab 494, ¶ 48 (VZ-MA August Supplemental OSS Aff.).

[331] See VZ-MA Application, Appdx. B, Vol. 32b, Tab 423, ¶ 88 (VZ-MA May OSS Aff.).

[332] Id. at ¶ 89.

TIS OC that were causing inaccuracies on the service order, but that VZ-MA has corrected the

cause for those errors and re-trained its TIS OC personnel under the correct methods and

procedures.[333] VZ-MA further explains that its strong performance in the area of installation

quality[334] reflects the company's position that its service order accuracy metrics do not reflect

an inability to process manual orders efficiently and accurately.[335]

Because order rejection rates are highly dependent upon factors that VZ-MA cannot

directly control, there is no C2C performance standard that VZ-MA must meet for order

rejections. However, VZ-MA does report its order reject rate based upon a C2C-approved

metric definition. VZ-MA states that its reported LSR reject rate is a misrepresentation of its

actual performance with respect to CLEC orders. First, VZ-MA notes that while the C2C-

approved calculation for its order reject rate includes in the numerator all rejected LSRs, the

denominator only includes the number of valid LSRs rather than the total number of LSRs

submitted, including rejected LSRs.[336] VZ-MA explains that this calculation method could

result in a reported order reject rate of greater than 100 percent. VZ-MA also notes that its

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[333]   Id. at ¶¶ 90-94.

[334]   Installation quality metrics are addressed in detail under VZ-MA's provisioning OSS
systems. See Section V.B.1.g.ii., below.

[335]   VZ-MA Application, Appdx. B, Vol. 42, Tab 494, ¶ 69 (VZ-MA August Supplemental
OSS Aff.).

[336]   VZ-MA Application, Appdx. B, Vol. 42, Tab 494, ¶ 13 (VZ-MA August Supplemental
Measurements Aff.).

calculation of the order reject rate also includes those orders that are manually corrected by the TIS OC rather than returned to the CLEC. These orders are included in the reject rate even though the CLECs never see them as errors. VZ-MA asserts that if these problems were corrected in the calculation, VZ-MA's order reject rates would be significantly lower than currently reported. The resale reject rates for April, May, and June would be, respectively, 33.8 percent (from 44.3 percent), 36.6 percent (from 48.3 percent), and 31.4 percent (from 39.3 percent). Similarly, recalculated UNE reject rates for the same time periods would be 12.5 percent (from 26.9 percent), 18.5 percent (from 29.1 percent), and 17.0 percent (from 20.8 percent).[337]

Similar to flow-through, the rate of order rejects is significantly impacted by CLECs' abilities to submit complete and accurate orders to VZ-MA's OSS. Disaggregated CLEC and reseller reject rate data shows that while some competitors in Massachusetts have experienced high rates of order rejects, others have had relatively few of their order submissions rejected by VZ-MA's systems. For resellers during the period of January through June 2000, reject rates range from less than 10 percent to well over 100 percent.[338] During the same period, CLECs ordering UNEs have experienced reject rates as low as 13 percent and as high as 53

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[337]   Id.

[338]   VZ-MA Application, Appdx. B, Vol. 47, Tab 553 (VZ–MA's Response to RR-DTE-342).

percent.[339] While VZ-MA is responsible for providing CLECs with the information they need

to produce accurate orders, the evidence of these wide ranges of reject rates between individual

carriers shows that the efforts put forth by the CLECs in submitting accurate LSRs are very

strongly tied to the overall order reject rates reported by VZ-MA.

VZ-MA currently does not transmit jeopardy notices to either CLECs or its own retail

representatives. VZ-MA explains that it provides CLECs with access to jeopardy information

through its Open Query System ("OQS"), which is updated three times daily and retains

information for approximately thirty days. The OQS process was developed in collaboration

with CLECs through proceedings held in New York. VZ-MA notes that its retail

representatives must log directly into either the Service Order Processor ("SOP") or the Work

Force Administration ("WFA") system to obtain jeopardy information or order status. CLECs

also have the ability, through VZ-MA's pre-ordering interfaces, to check order status directly

in either the SOP or the WFA system.[340] Though VZ-MA currently provides CLECs with

parity to its retail representatives in terms of the availability of jeopardy information, in

response to CLEC requests,[341] VZ-MA has agreed through the Change Management process to

implement EDI jeopardy notification in October 2000. In the meantime, VZ-MA has set up an

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[339] Id.

[340] VZ-MA Application, Appdx. B, Vol. 32b, Tab 423, ¶¶ 95-97 (VZ-MA May OSS
Aff.).

[341] See, e.g., VZ-MA Application, Appdx. B, Vol. 37, Tab 455, ¶¶ 120-123 (WorldCom
Lichtenberg/Sivori Decl.).

e-mail notification process to transmit jeopardy information to CLECs.[342]

VZ-MA provides two distinct completion notices to CLECs to signify that an order has been provisioned and processed through the company's billing systems. The first notice to be received by the CLEC is the Provisioning Completion Notice ("PCN"), which notifies the CLEC that all provisioning work has been finished and that the CLEC can then take responsibility for the provision of the end customer's service. VZ-MA notes that it began providing PCNs to CLECs in August 1999 to assuage concerns that there was a lag between the completion of the physical provisioning of an order and the processing of that order through VZ-MA's billing systems.[343] Under the C2C Guidelines, VZ-MA must provide 95 percent of PCNs before noon on the day following work completion. VZ-MA sends all of its PCNs electronically over the same interface the CLEC used to submit the order.

Upon completion of the processing of an order through VZ-MA's billing systems, VZ-MA electronically submits to the CLEC a Billing Completion Notice ("BCN"), which notifies the CLEC that VZ-MA has made the necessary adjustments to the customer's account so that the CLEC may commence billing of that customer. VZ-MA provides BCNs to CLECs electronically over the same interface the CLEC used to submit the initial order. VZ-MA is required under the C2C Guidelines to provide 95 percent of BCNs to CLECs before noon on

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[342] VZ-MA Application, Appdx. B, Vol. 42, Tab 494, ¶ 71 (VZ-MA August Supplemental OSS Aff.).

[343] VZ-MA Application, Appdx. B, Vol. 32b, Tab 423, ¶ 99 (VZ-MA May OSS Aff.).

the day following the date of billing completion, or the CRIS completion date. VZ-MA notes

that it does not actively transmit to its retail representatives any completion notices. If retail

representatives need to determine whether or not a particular order has been completed, they

must check the SOP for the status of the order. VZ-MA notes that CLECs are also able to

perform this type of inquiry if they have reason to require completion information before a

PCN or BCN is generated.[344] Finally, VZ-MA notes that it began providing fielded complex

completion notices to CLECs as part of its June 2000 LSOG-4 software release.[345]

With respect to PCN on-time performance, VZ-MA met its requirement of 95 percent

by noon the next business day in every month from April through July 2000 for both resale and

UNE offerings. VZ-MA's BCN performance over the same period, however, did not achieve

results as successful. With respect to resale services, VZ-MA's BCN on-time performances

were 86.83 percent (April), 93.29 percent (May), 92.43 percent (June), and 99.24 percent

(July). For UNE offerings, VZ-MA's performance was reported as 99.98 percent (April),

95.21 percent (May), 85.06 percent (June), and 96.85 percent (July). VZ-MA explains that

the lower performance in resale and UNE BCN timeliness is the result of a system error that

failed to time-stamp the completion notices, and the default value for the field caused some on-

time BCNs to be erroneously scored as late. VZ-MA notes that it resolved this error on

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[344]   Id.

[345]   VZ-MA Application, Appdx. B, Vol. 34b, Tab 443 (VZ–MA's Response to
        DTE-WorldCom-4-6).